

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

TAMIA BANKS, *et al.*, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

COTTER CORPORATION, *et al.*

Defendants.

**Civil Action No. 4:20-CV-01227**

COTTER CORPORATION (N.S.L.)

Third-Party Plaintiff

v.

MALLINCKRODT LLC, *et al.*,

Third-Party Defendants

**NOTICE OF LAB RESULTS PERTAINING TO JANA ELEMENTARY SCHOOL**

COME NOW, Plaintiffs, by and through undersigned counsel, who provide notice to this Court and all parties of the following:

1. On August 1, 2022, Plaintiffs filed an Emergency Motion to Lift Stay to Allow for Limited Discovery (Doc. 111) related to gaining access to Jana Elementary School in Florissant, Missouri, in order to sample the school grounds for radioactive contamination.

2. On August 4, 2022, Plaintiffs informed this court by Notice that Plaintiffs were withdrawing their Emergency Motion because the Hazelwood School District voted to allow the

Plaintiffs' experts to access Jana Elementary School to conduct scientific sampling. (Doc. 113).

3. On August 15, 2022, Plaintiffs' experts, Dr. Marco Kaltofen of Boston Chemical Data Corp., and professional geologist Brian Moore of Carriage House Consulting, collected samples at Jana Elementary.

4. On October 10, 2022, Dr. Kaltofen issued a report that detailed the results of this sampling. A copy of Dr. Kaltofen's report and the accompanying data is attached hereto as Exhibit 1.

5. In addition, on October 17, 2022, former EPA Superfund scientist and toxicologist Dr. Richard Troast issued a report discussing the health risks presented by the contaminants of found at Jana Elementary School. A copy of Dr. Troast's report is attached hereto as Exhibit 2.

6. Pursuant to Plaintiffs' Notice (Doc. 113), a copy of this notice and the attached reports and lab results will be provided to the following entities:

- a. Hazelwood School District
- b. Jana Elementary School Parent Teacher Association
- c. Missouri Coalition for the Environment
- d. Missouri Department of Public Health
- e. U.S. Army Corps of Engineering c/o FUSRAP
- f. U.S. Environmental Protection Agency
- g. Defendants to this action

Dated: October 17, 2022

Respectfully submitted,

KEANE LAW LLC

/s/ Ryan Keane

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 17, 2022, a true and accurate copy of the foregoing was served by filing it in the court's electronic filing system, which will provide electronic notice and a copy of the filing to all parties and attorneys of record.

/s/ Ryan A. Keane